

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In Re: Maria Del Carmen Ramos)	
)	Case No.: 16-14859
)	
Debtor)	Chapter: 13

**MOTION TO MODIFY THE CHAPTER 13 PLAN - POST CONFIRMATION OF THE
DEBTOR, MARIA RAMOS**

Debtor, Maria Del Carmen Ramos, by and through her counsel, William P. Marshall, Esquire avers as follows in support of her motion to modify the Chapter 13 Plan - Post Confirmation:

1. This Court approved and confirmed the Chapter 13 Plan of the Debtor, Maria Del Carmen Ramos on or about October 24, 2017.
2. With the approval of the Trustee, and the Court, the Debtor and Creditor U.S. National Bank Ass'n, Trustee for Pennsylvania Housing Finance Authority entered into a stipulation to resolve the creditor's motion for relief from the automatic stay.
3. The approved stipulation required the Debtor to submit an amended Plan within 10 days of the approval to address the need for additional funding in the amount of \$9878.86 over the remaining months of the Plan. (A true and correct copy of the approved stipulation is attached hereto and marked as Exhibit "A")
4. Debtor proposes to address the additional funding necessary to address the inclusion of post petition arrears in the Plan arising out of the stipulation by way of the Third Amended Plan, that is appended hereto. (A true and correct copy of the proposed amended Plan is attached hereto and marked as Exhibit "B")
5. Debtor seeks relief in the form of an Order of Court approving this Third Amended Plan - Post Confirmation.

WHEREFORE, it is respectfully requested that this Honorable Court approve the proposed

Third Amended Plan and require the Debtor to file the same with the Court within 10 days from the date of this Order.

Respectfully submitted:

By: William P. Marshall s/
WILLIAM P. MARSHALL, ESQUIRE
Attorney for Debtor,
Maria Del Carmen Ramos